

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

DEMOCRACY NORTH CAROLINA, THE
LEAGUE OF WOMEN VOTERS OF
NORTH CAROLINA, DONNA PERMAR,
JOHN P. CLARK, MARGARET B. CATES,
LELIA BENTLEY, REGINA WHITNEY
EDWARDS, ROBERT K. PRIDDY II,
WALTER HUTCHINS, AND SUSAN
SCHAFFER.

Plaintiffs,

vs.

THE NORTH CAROLINA STATE BOARD
OF ELECTIONS; DAMON CIRCOSTA, in
his official capacity as CHAIR OF THE
STATE BOARD OF ELECTIONS; STELLA
ANDERSON, in her official capacity as
SECRETARY OF THE STATE BOARD OF
ELECTIONS; KEN RAYMOND, in his
official capacity as MEMBER OF THE
STATE BOARD OF ELECTIONS; JEFF
CARMON III, in his official capacity as
MEMBER OF THE STATE BOARD OF
ELECTIONS; DAVID C. BLACK, in his
official capacity as MEMBER OF THE
STATE BOARD OF ELECTIONS; THE
NORTH CAROLINA DEPARTMENT OF
TRANSPORTATION; J. ERIC BOYETTE,
in his official capacity as
TRANSPORTATION SECRETARY; THE
NORTH CAROLINA DEPARTMENT OF
HEALTH AND HUMAN SERVICES;
MANDY COHEN, in her official capacity as
SECRETARY OF HEALTH AND HUMAN
SERVICES,

Defendants.

Civil Action No. 20-cv-457

**DECLARATION OF CHRISTOPHER KETCHIE IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Christopher Ketchie, hereby declare:

1. All facts set forth herein are based on my personal knowledge, and if called upon to testify as to the contents of this Declaration, I could and would do so.

2. I am a demographer and data analyst for Southern Coalition for Social Justice, where I specialize in research, analysis, and spatial visualization of demographic and electoral data.

3. In this matter, I have used public data sets to isolate certain statistics for reference in the Complaint and the Brief in Support of Plaintiffs' Motion for Preliminary Injunction.

4. To determine changes in voter registration rates between 2016 and 2020, I used the *NVRA Data (2008 to present)* (last updated June 2, 2020), published by the North Carolina State Board of Elections and available at https://s3.amazonaws.com/dl.ncsbe.gov/NVRA/nvra_stats_all.txt. The data file is accessible by going to <https://www.ncsbe.gov/Public-Records-Data-Info/Election-Results-Data>, and navigating to "FTP Site" → "NVRA" → "nvra_stats_all.txt." By summing the "Count" field for total registrations (new, changed, and duplicate) and aggregating by year and month (using the "NVRA Date" field) for each month in 2016 and 2020, I determined that January 2020 had a 162% increase in registrations compared to 2016, while February, March, and April 2020 had changes of -10%, -14%, and -50% compared to the same months of 2016 respectively.

5. To determine the rate of absentee mail-in ballots rejected for the March 2020 North Carolina primary, I used data from the *March 3, 2020 Absentee File*, published by

the North Carolina State Board of Elections and available at https://s3.amazonaws.com/dl.ncsbe.gov/ENRS/2020_03_03/absentee_20200303.zip. This data file is accessible by going to <https://www.ncsbe.gov/Public-Records-Data-Info/Election-Results-Data> and navigating to “FTP Site” → “ENRS” → “2020_03_03” → “absentee_20200303.zip”. By aggregating absentee mail-in ballots by ballot return status in the “ballot_rtn_status” field (either accepted or reason for rejection), and dividing those rejected by the total, I determined that almost 15% (14.6%) of submitted absentee mail-in ballots were rejected. The statistics generated from the absentee file do not include absentee by mail ballots that were either requested and not sent to the voter or sent to the voter but not returned to the State Board of Elections (i.e. those with a null value in the “ballot_rtn_status” field).

6. To determine the percent of voters who cast mail-in absentee ballots in the 2016 general election, I used data from *November 8, 2016 History Statistics*, published by the North Carolina State Board of Elections and available at https://s3.amazonaws.com/dl.ncsbe.gov/ENRS/2016_11_08/history_stats_20161108.zip. This data file is accessible by going to <https://www.ncsbe.gov/Public-Records-Data-Info/Election-Results-Data> and navigating to “FTP Site” → “ENRS” → “2016_11_08” → “history_stats_20161108.zip”. By aggregating all votes cast by voting method in the “voting_method_desc” field, and dividing those with the “ABSENTEE BY MAIL” category by that aggregate, I determined that 4% of voters cast mail-in absentee ballots in the 2016 general election.

7. To determine the percent of precincts in North Carolina that have over 5,000

voters, I used data from *Voter Registration File* (Last updated May 30, 2020), published by the North Carolina State Board of Elections and available at https://s3.amazonaws.com/dl.ncsbe.gov/data/ncvoter_Statewide.zip. This data file is accessible by going to <https://www.ncsbe.gov/Public-Records-Data-Info/Election-Results-Data> and navigating to “FTP Site” → “data” → “ncvoter_Statewide.zip”. By aggregating voters by county and precinct using the “county_desc” and “precinct_abbrev” fields, and sorting by total voters, I determined that 216 precincts in North Carolina have 5,000 or more voters.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 4th day of June, 2020



/s/

Christopher Ketchie